



U.S. Department of Justice  
Civil Division, Federal Programs Branch

20 Massachusetts Ave., NW  
Washington, DC 20530

Daniel Halainen  
Trial Attorney

Tel.: (202) 616-8101  
Fax: (202) 616-8470  
daniel.j.halainen@usdoj.gov

September 8, 2017

Via ECF and by Fax

The Hon. Naomi Reice Buchwald  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

SDC SDNY  
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Re: *Knight First Amendment Institute at Columbia University, et al. v. Trump, et al.*,  
No. 17-cv-5205 (NRB)

Dear Judge Buchwald,

The parties in the above-referenced matter write to update the Court on the status of their negotiations regarding a joint stipulation of facts. The parties have exchanged drafts of a proposed joint stipulation of facts and continue to believe that this approach is broadly workable, although they are still negotiating certain details. The parties will endeavor to file a joint stipulation and propose a briefing schedule by next Friday. If the parties are unable to do so by next Friday, they will propose a schedule for further proceedings.

In addition, in light of these ongoing negotiations, Defendants respectfully request that the deadline for Defendants to file a responsive pleading to the Complaint be extended from September 15, 2017, to September 29, 2017. There have been no previous requests for an extension of this deadline. Plaintiffs do not object to this request.

Respectfully submitted,

/s/ Jameel Jaffer

Jameel Jaffer (JJ-4653)  
Katherine Fallow (application for admission  
pending)  
Alex Abdo (AA-0527)  
Knight First Amendment Institute  
at Columbia University

Jessica Ring Amunson (*pro hac vice*)  
Tassity S. Johnson (*pro hac vice*)  
Jenner & Block LLP  
1099 New York Avenue, NW, Suite 900  
Washington, DC 20001

Application  
granted.  
Naomi Reice  
Buchwald,  
USDC  
9/11/17

314 Low Library  
535 West 116th Street  
New York, NY 10027  
(212) 854-9600  
Jameel.Jaffer@knightcolumbia.org

*Counsel for Plaintiffs*

CHAD A. READLER  
Acting Assistant Attorney General

ERIC R. WOMACK  
Assistant Branch Director

/s/ Daniel Halainen

MICHAEL H. BAER  
DANIEL HALAINEN  
Trial Attorneys  
U.S. Department of Justice,  
Civil Division, Federal Programs Branch  
20 Massachusetts Avenue, NW  
Washington, DC 20530  
Telephone: (202) 616-8101  
Facsimile: (202) 616-8470  
E-mail: daniel.j.halainen@usdoj.gov

*Counsel for Defendants*